

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

D-1 Ricardo Martinez

D-2 Dwight Hassan Rashad

Case: 2:19-mj-30614

Assigned To : Unassigned

Assign. Date : 11/22/2019

Description: RE: Ricardo Martinez, Dwight Hassan Rashad

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 21, 2019 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

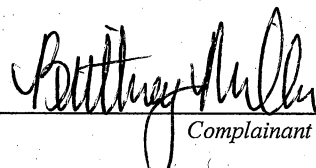
21 U.S.C. §841(a)(1)

21 U.S.C. §846

Possession with Intent to Distribute a Controlled
 Substance & Conspiracy to Possess with Intent to
 Distribute a Controlled Substance

This criminal complaint is based on these facts:

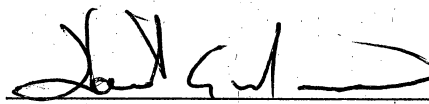
See attached affidavit

☐ Continued on the attached sheet.

Complainant's signature

Brittney Miller, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: November 22, 2019City and state: Detroit, Michigan

Judge's signature

David H. Goral U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I Brittney Miller, a Special Agent (SA) with the Drug Enforcement Administration (DEA) being duly sworn, deposes and states the following:

1. I have been employed as Special Agent of the DEA since July 2016. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. This affidavit is made in support of a criminal complaint against Ricardo MARTINEZ and Dwight Hassan RASHAD for violations of 21 U.S.C. §841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 21 U.S.C. §846 (Conspiracy to Possess with Intent to Distribute a Controlled Substance).

3. Because of the limited purpose of this affidavit, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that MARTINEZ and RASHAD have violated 21 U.S.C. §§841(a)(1) and 846.

4. In November 2019, DEA investigators in Detroit received information that there would be a transfer of suspected drug proceeds in the near future with an individual later identified as Ricardo MARTINEZ.

5. On November 21, 2019, investigators observed MARTINEZ and RASHAD walk out of a residence at 1XXX Marvin Gaye Drive in Detroit carrying a bag. Investigators observed RASHAD and MARTINEZ depart the location in a black F-150. Investigators observed that MARTINEZ and RASHAD stopped briefly at a liquor store, but investigators did not observe anyone get in or out of the black F-150.


6. Approximately ten minutes after they left Marvin Gaye Drive, Michigan State Police (MSP) initiated a traffic stop on MARTINEZ and RASHAD in the black F-150. They were identified through their respective driver's licenses. A MSP Trooper conducted a search of the black F-150, utilizing his canine who is trained to detect the odor of narcotics. During the search of the vehicle, the canine gave a positive indication for the odor of narcotics on a bag in the back seat of the F-150. A further search of the bag revealed several stacks of United States currency wrapped in several rubber bands, further concealed by clear plastic sealed bags. Five of the stacks of currency were marked "50k" and one of the stacks was marked "35k."

7. A search warrant for 1XXX Marvin Gaye Drive was authorized by Magistrate Judge Meletios T. Golematis of the 28th District Court of Michigan. Previous physical surveillance, electronic surveillance and a

statement given by one of MARTINEZ's neighbors associated MARTINEZ with the residence.

8. The search of 1XXX Marvin Gaye Drive resulted in the seizure of suspected fentanyl, suspected marijuana, suspected heroin and a rifle. Items utilized for drug processing were also found in the residence in close proximity to the controlled substances. These items included Narcan, several full face masks, gloves, scales, cutting agents, blenders and heat seal bags.

9. Based on the foregoing, there is probable cause to believe that Ricardo MARTINEZ and Dwight Hassan RASHAD have committed violations of 21 U.S.C. §841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 21 U.S.C. §846 (Conspiracy to Possess with Intent to Distribute a Controlled Substance).



Brittney R. Miller, Special Agent
Drug Enforcement Administration

Sworn to and subscribed before
me this 22nd day of November, 2019.



HONORABLE DAVID GRAND
United States District Court Magistrate Judge
Eastern District of Michigan